

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,
v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,
v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff VirtaMove, Corp. (“Plaintiff”) and Defendant International Business Machines Corp. (“Defendant”) hereby jointly move for a two-week extension of time for Plaintiff to file its response to Defendant’s Motion to Dismiss in *VirtaMove, Corp. v. International Business Machines Corp.*, Case No. 2:24-CV-00064-JRG, Dkt. 15 (E.D. Tex. Apr. 15, 2024), and an additional nine (9) days for Defendant to file its reply in support of the Motion.

Plaintiff’s deadline to respond to the Motion is currently April 29, 2024 and, with this two-week extension, the deadline would be May 13, 2024. Defendant’s deadline to reply in support of the Motion is currently due on May 6, 2024 and, with an additional nine (9) days to respond, the deadline would be May 29, 2024. These extensions are not being sought for purposes of delay, but

rather to ensure the parties and their counsel have adequate time to address the issues raised in Defendant's Motion.

Counsel for the parties have conferred and all parties stipulate to this extension. Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

Dated: April 23, 2024

Respectfully submitted,

By: /s/ Reza Mirzaie

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*Attorneys for Defendant
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CERTIFICATE OF SERVICE

I certify that on April 23, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Reza Mirzaie

Reza Mirzaie